

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 22-342 (SCC)

[1] WANDA VAZQUEZ-GARCED,
[2] JULIO M. HERRERA-VELUTINI,
[3] MARK T. ROSSINI,

Defendants.

**JOINT INFORMATIVE MOTION AND
REQUEST FOR VIRTUAL HEARING**

TO THE HONORABLE COURT:

COMES NOW all defendants, through their undersigned attorneys, and respectfully state the following:

1. The parties hereby inform the Court that they have reached an agreement with the government. Under this agreement, the government will file a one-count Information. Accordingly, the parties respectfully request that the Court schedule a hearing at which the defendants may be arraigned and enter their pleas pursuant to this agreement.

2. Additionally, the parties request that the Court conduct the hearing virtually. Two of the defendants, Mr. Herrera and Mr. Rossini, currently reside outside the United States. Additionally, Mr. Herrera is unable to enter the United States at this time because his visa expired. A virtual hearing for all defendants will allow this matter to proceed without any delay and expeditiously. All counsel of record consent to this request. The government has no objection to proceeding virtually.

WHEREFORE, the parties respectfully request that the Court take notice of this agreement and schedule a hearing to be conducted virtually.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of June 2025.

DLA Piper (Puerto Rico) LLC

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón
USDC-PR No. 209310
sonia.torres@us.dlapiper.com
500 Calle de la Tanca, Ste. 401
San Juan, PR 00901-1969
Telephone: (787) 945-9120

/s/ Luis A. Plaza-Mariota

Luis A. Plaza-Mariota
USDC - PR 124806
Luis A. Plaza Law Offices
P.O. Box 362122
San Juan, Puerto Rico 00936-2122
Tel: 787-764-0310 Tel: 787-281-8100
plaza@luisplazalaw.com

The LS Law Firm

/s/ Lilly Ann Sanchez

Lilly Ann Sanchez, Esq.
Fla. Bar No. 195677
Email: lsanchez@thelsfirm.com
One Biscayne Tower, Suite 2530
2 South Biscayne Blvd.
Miami, Florida 33131
Telephone: (305) 503-5503
Facsimile: (305) 503-6801

/s/ Ignacio Fernandez de Lahongrais

Ignacio Fernandez de Lahongrais
Avenida Ponce de León, Suite 1210
San Juan, Puerto Rico 00918-1475
Tel. 787-923-5789
ignacio@bufetefernandezalcaraz.com

/s/ Edgar Sanchez Mercado

EDGAR SANCHEZ MERCADO
USDC-PR 227004
esmlawoffice@gmail.com
255 Avenida Ponce de León, Suite 1210
San Juan, Puerto Rico 00918-1475

CONTINENTAL, PLLC

/s/ Christopher M. Kise

Christopher M. Kise
FBN 855545
Admitted ProHacVice
Primary Email: ckise@continentalpllc.com
Secondary Email: cforjet@continentalpllc.com
101 N. Monroe Street., Suite 750
Tallahassee, FL 32301
Telephone: (850) 332-0702
Attorneys for Julio Herrera Velutini

/s/ Peter John Porrrata

PETER JOHN PORRATA
USDC – PR 128901
PO BOX 3943
Guaynabo, PR 00969-3943
Tel. 407-953-9888
peterjohnporrata@gmail.com

Attorneys for Wanda Vazquez Garced

LIZARRIBAR MASINI LAW OFFICE

/s/ Lydia Lizarribar Masini

G-14 O'Neill Street, Suite A

San Juan, PR 00918

(787) 250-7505

lizarribarlaw@gmail.com

STUMPHAUZER KOLAYA

NADLER & SLOMAN, PLLC

Two South Biscayne Boulevard, Suite 1600

One Biscayne Tower

Miami, FL 33131

Telephone: (305) 614-1400

Facsimile: (305) 614-1425

/s/ Michael B. Nadler

Michael B. Nadler

Fla. Bar No. 51264

mnadler@sknlaw.com

Admitted pro hac vice

/s/ Juan J. Michelen

Juan J. Michelen

Fla. Bar No. 92901

jmichelen@sknlaw.com

Admitted pro hac vice

Attorneys for Mark T. Rossini

CERTIFICATE OF SERVICE

It is hereby certified that on this date the present motion is filed with the Clerk of the Court through the CM/ECF electronic system which will notify and provide copies to all parties of record.

/s/ Sonia I. Torres-Pabón